

Changes to evidentiary requirements for activity 34



11 January 2021



We have reviewed the stakeholder feedback to our consultation process for the proposed evidentiary requirements for high-bay product replacements¹.



We have updated our Building Based Lighting Upgrade Activity Guide with the changes to the evidentiary requirements.

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The additional evidentiary requirements for high-bay product replacements are effective for activity creations on or after 1 February 2021.

Background

In 2020 we conducted an audit investigation into LED high-bay installations where it appears that inefficient high-bay lamp products were installed to inflate the energy consumption of the original baseline environment. On 13 November 2020, the commission published a program update with the proposed changes to the evidentiary requirements for high-bay product replacements and asked stakeholders for feedback.

Initial proposal as per program update from 13 November 2020

Table 1 shows the initial changes we proposed to make to the Building Based Lighting Upgrade Activity Guide for high-bay product replacements, in addition to the current evidentiary requirements listed in Tables 9 and 13 of the guide.

¹ High-bay products are the following items listed in Table 34.10 of the VEU specifications: Metal halide lamp with magnetic ballast, metal halide lamp with electronic ballast, mercury vapour lamp with ballast, high pressure sodium lamp with magnetic ballast, self-ballasted mercury vapour lamp.





Table 1: Initially proposed changes to the evidentiary requirements for high-bay product replacements

Initial proposal	Type of evidence	Description
Proposal #1	Evidence of baseline lighting configuration (non-J6 only) (Table 9 of the guide)	<ul style="list-style-type: none">• For high-bay product replacements:<ul style="list-style-type: none">– geo-tagged photographs of each upgraded space type showing the arrangement of at least 75 per cent of the existing lighting equipment before removal from its original position with the lighting equipment turned on, and separate geo-tagged photographs with the same lighting equipment turned off.
Proposal #2	Evidence of decommissioning and recycling of lighting equipment (Table 13 of the guide)	<ul style="list-style-type: none">• For high-bay product replacements:<ul style="list-style-type: none">– geo-tagged photograph(s) of all decommissioned lamps with the lamp markings facing up and clearly legible and in focus– geo-tagged photograph(s) of the removed ballast boxes lined up in a row with the lamp holders facing up and in focus.

Stakeholder feedback on proposed changes

Twelve stakeholders responded to the consultation process. We thank all stakeholders who provided us their feedback.

Initial proposal #1

Most stakeholders agreed with initial proposal #1. Four stakeholders raised concerns about the requirement to take a separate geo-tagged photograph with the lighting equipment turned off. This would cause possible safety issues and it would interfere with the operation at upgrade sites. Two stakeholders suggested requesting an electricity invoice as additional evidence from the energy consumer to show that power has been connected to the upgrade site.

Initial proposal #2

Most stakeholders were concerned about the requirement to take geo-tagged photograph(s) of all decommissioned lamps with the lamp markings facing up and clearly legible and in focus. The majority of stakeholders indicated that lining up the lamps with the markings facing up would take a long time. Two stakeholders suggested that the geo-tagged photograph would need to be of a very



high resolution to assure all markings on the lamps are legible. Another stakeholder stated that this requirement would not be possible to meet for all lamps. The markings would not be legible due to their age or dust covering the lamps.

Three stakeholders expressed concerns about the requirement to take geo-tagged photograph(s) of the removed ballast boxes lined up in a row with the lamp holders facing up and in focus. Some ballast boxes cannot be lined with their lamp holders facing up due to their shape. Two stakeholders suggested that accredited persons (APs) produce an additional geo-tagged photograph that shows the electric cords of the ballast boxes as cut off. One AP suggested to measure the dimension of the upgrade site to estimate the possible illumination power density and allowable number of baseline high-bays.

Evidentiary requirements for high-bay product replacements effective from 1 February 2021

We have considered your feedback and made changes to our initial proposal. Table 2 shows the changes to the Building Based Lighting Upgrade Activity Guide for high-bay product replacements, in addition to the current evidentiary requirements listed in Tables 8 and 12 of the updated guide.

Table 2: Additional evidence requirements for high-bay product replacements

Type of evidence	Description
Evidence of baseline lighting configuration (non-J6 only) (Table 8 of the updated guide)	<ul style="list-style-type: none">• For high-bay product replacements:<ul style="list-style-type: none">– geo-tagged photographs of each upgraded space type showing the arrangement of at least 75 per cent of the existing lighting equipment before removal from its original position² with the lights on.

² Please indicate on the professionally drafted reflective ceiling plan/site plan the positions the photographs were taken from. For upgrades at large sites, particularly those involving multiple similar spaces (such as hospitals), where you believe meeting this requirement will be difficult to achieve, please contact us at veu@esc.vic.gov.au to discuss alternative evidentiary requirements



Type of evidence	Description
Evidence of decommissioning and recycling of lighting equipment (Table 12 of the updated guide)	<ul style="list-style-type: none">• For high-bay product replacements:<ul style="list-style-type: none">– geo-tagged photograph(s) of the removed ballast boxes lined up in a row with the lamp holders facing up and in focus.³

Evidence of power connected to upgrade site

Following your feedback to the consultation process, we have added an additional requirement for APs to show that power has been connected to the upgraded site. Table 3 shows the evidence you must collect to meet this requirement for all upgrade sites regardless of the lamp technology that APs replace.

Table 3: Evidence of power connected to upgrade site

Type of evidence	Description
Electricity invoice (new table 15 of the updated guide)	An electricity invoice issued by the energy retailer to the energy consumer of the upgrade site. The electricity invoice must be issued within three months prior to the activity date.

What this means for accredited persons

APs must collect the above evidence in support of their building based lighting upgrade activities created on or after 1 February 2021. The Victorian Energy Upgrades (VEU) Validations team and the VEU Audit & Compliance team will ask for the additional evidence as part of their certificate assessment and audit investigation processes. In addition to these changes, the commission will be increasing its audit processes in relation to high-bay installation creation claims.

³ If the lamp holders of the ballast boxes cannot face up due to the shape of the ballast box, the lamp holders must be facing the lens of the camera.



Updated Building Based Lighting Upgrade Activity Guide

We have updated the Building Based Lighting Upgrade Activity Guide to reflect the above changes which is available at our [website](#).

Where to get help

If you have any questions or feedback with respect to matters set out in this program update, please contact VEU Support on (03) 9032 1310 or veu@esc.vic.gov.au

